

UNITED STATES OF BANKRUPTCY COURT DISTRICT OF NEW JERSEY <u>Caption in Compliance with D.N.J. LBR 9004-2</u> STARFIELD & SMITH, P.C. Lyndsay Rowland Id No. 018802007 1300 Virginia Drive, Suite 325 Fort Washington, PA 19034 Tel: 215.542.7070 Fax: 215.542.0723	
IN RE: Forgotten Boardwalk Brewing, LLC Debtor.	Case No: 24-10327 Chapter 11 Judge Jerrold N. Poslusny Jr.

CERTIFICATION OF PLAN DEFAULT

COMES NOW, CREDIT UNION OF NEW JERSEY (“CUNJ”), secured creditor in the above-numbered bankruptcy case, by and through its counsel, Starfield & Smith, P.C., and files this **Notice of Plan Default**, and in support thereof would show the Court as follows:

1. The Debtor defaulted under the terms of the Chapter 11 Plan (“Plan”) by failing to remit the required monthly plan payments to CUNJ for the months of July 2024, August 2024 and September 2024.

2. To date, the Debtor is in default to CUNJ for the amount of \$23,545.14, as set forth in the attached amortization schedule attached hereto as Exhibit “1.”

3. CUNJ reached out to Debtor’s via their bankruptcy counsel on August 8, 2024 regarding the past due payments, and again on August 21, 2024, regarding the default under the Plan.

4. A copy of the Debtor’s Plan and Confirmation Order, and Past Due/Notice of Default are attached hereto respectively as Exhibit “2,” and Exhibit “3.”

5. CUNJ intends to exercise its full rights pursuant to the state law and/or remedies under the Loan Documents and/or the Uniform Commercial Code, without further notice and files this **Notice of Plan Default**.

Dated: September 10, 2024

STARFIELD & SMITH, P.C.

By: /s/ Lyndsay E Rowland
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